



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DMP:SK/JAM/AFM  
F. #2016R02228

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 10, 2021

By ECF

The Honorable Eric R. Komitee  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Aleksandr Zhukov  
Criminal Docket No. 18-633 (S-1)(EK)

Dear Judge Komitee:

The government writes to correct the record in connection with the hearing scheduled for March 12, 2021.

In the course of preparing for that hearing, the government has been engaged in efforts to search for and collect material that may be discoverable pursuant to Federal Rule of Criminal Procedure 26.2. Because of the passage of time, some of those materials are not accessible to the witnesses themselves, and are instead stored in archival databases. The government previously requested searches of those archives. This afternoon, the government received partial results from those searches, which included the email marked as GX 1, a message from SSA Jack Liao to then-Inspector Vladimir Dimitrov with the words “for printing,” attaching a list of questions and other related material.

The government writes to advise the Court and defense counsel of the existence of this email and its contents, to disclose that the questions were in fact sent from Jack Liao to Vladimir Dimitrov, and to therefore correct the record from its previous filings.

The government was previously unaware of the existence of this email and is taking this matter seriously. The government is continuing its efforts to ensure that it collects all material that may be discoverable in connection with this hearing. In light of the need to complete its search, the government respectfully requests that the hearing scheduled for this Friday be rescheduled to a later date. The government has already conferred with defense

counsel, and defense counsel agrees that the hearing should be rescheduled to a later date in order to permit collection and disclosure of Rule 26.2 material.

Respectfully submitted,

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cc: Zachary Margulis-Ohnuma, Esq. (by ECF)